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September 3, 2013

Honorable Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Case No. 11-cr-00486-DLI-JMA-17, U.S. v. Thaqi, et al

Dear Judge Irizarry:

The above matter is presently scheduled for sentencing before Your Honor on Tuesday, September 17, 2013, at 10:00am. This is a request to continue the matter to a time convenient to all parties in either October (except October 4) or the first two weeks of November.

I was scheduled to start a felony trial in the Riverside County Superior Court (California) on Monday, August 19 which was expected to last 7 to 10 days (People v. Ian Palma, Case number RIF1102430). On that date the prosecutor assigned to the case was then in trial so the matter was continued to Tuesday, August 27. Under California law when a case is called for trial the matter must be tried within 10 days unless the defendant waives time. When the matter was recalled for trial last Tuesday it was day 7 of the 10 day rule. There were no courtrooms available to try the case except for a regional courthouse about 80 miles away. This geographic difference worked a great hardship on both counsel and witnesses. As a result, the Court offered us a trial department on September 9 with a guarantee to commence on that date since the Judge assigned to that department will be returning from vacation.

The case has now been rescheduled to that date and as I mentioned it is expected to last 7 to 10 Court days. Accordingly I expect to be in trial on our scheduled sentencing date and will be requesting of the Court that the matter be adjourned to some convenient

date as mentioned above.

I have checked with Assistant United States Attorney Steven Tiscione and he has no objection to that request other than to mention that he is unavailable on October 17.

Sincerely,

A handwritten signature in black ink, appearing to be 'Jan Ronis', written over the printed name.

Jan Ronis
Attorney for Mr. Dubiel

cc: AUSA Steven Tiscione